

FILE NO. 000001

SEP 28 2005

**JOE T. SMITH,**

**Plaintiff,**

**VS.**

**AMERICAN INTERNATIONAL GROUP, INC;  
AMERICAN GENERAL CORPORATION;  
AMERICAN GENERAL FINANCE, INC.;  
AMERICAN GENERAL FINANCE CORPORATION;  
MERIT LIFE INSURANCE COMPANY;  
KIMBERLY SINGLETON; PAT PORTER;  
ROY T. EVANS;  
and Fictitious Defendants “A”,  
“B”, and “C”, whether singular or plural, those  
other persons, corporations, firms, or other  
entities whose wrongful conduct caused  
the injuries and damages to the Plaintiff,  
all of whose true and correct names are  
unknown to Plaintiff at this time, but will  
be substituted by amendment when ascertained,**

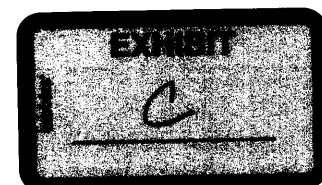
**Defendants.**

CIVILCASE NO. CV-2005- 104

## COMPLAINT

## STATEMENT OF THE PARTIES

1. This court has subject matter and personal jurisdiction over the Defendants. Venue is proper in Bullock County, Alabama.
2. Plaintiff Joe T. Smith is an adult resident citizen of Bullock County, Alabama.
3. Defendant American General Finance, Inc. is a domestic corporation, who does business by agent in Bullock County, Alabama. This Defendant is the agent, a subsidiary, sister corporation, and/or the “alter-ego” of one or more Defendants.



4. Defendant American International Group, Inc. is a foreign corporation who does business by agent in Bullock County, Alabama. This Defendant is the agent, a subsidiary, sister corporation, and/or the “alter-ego” of one or more Defendants.

5. Defendant American General Corporation is a foreign corporation who does business by agent in Bullock County, Alabama. This Defendant is the agent, a subsidiary, sister corporation, and/or the “alter-ego” of one or more Defendants.

6. Defendant American General Finance Corporation is a foreign corporation who does business by agent in Bullock County, Alabama. This Defendant is the agent, a subsidiary, sister corporation, and/or the “alter-ego” of one or more Defendants.

7. Defendant Merit Life Insurance Company is a foreign insurance company who does business by agent in Bullock County, Alabama. This Defendant is the agent, a subsidiary, sister corporation, and/or the “alter-ego” of one or more Defendants.

8. Defendant Kimberly Singleton is over the age of nineteen (19) and is a resident of Montgomery County, Alabama.

9. Defendant Pat Porter is over the age of nineteen (19) and is a resident of Montgomery County, Alabama.

10. Defendant Roy T. Evans is over the age of nineteen (19) and is a resident of Montgomery County, Alabama.

11. Fictitious Defendants “A”, “B”, and “C”, whether singular or plural, are those other persons, firms, corporations, or other entities whose wrongful conduct caused or contributed to cause the injuries and damages to the Plaintiff, all of whose true and correct names are unknown to Plaintiff at this time, but will be substituted by amendment when ascertained.

12. Plaintiff's claims are brought solely under Alabama law, and Plaintiff states he does not bring any claim and/or disclaim any and all claims under any Federal laws, statutes, or regulations.

### **STATEMENT OF THE FACTS**

13. On or about June 28, 2001, August 14, 2001, November 23, 2001 and other occasions, Plaintiff entered into several loans with Defendants at which time Defendants Kimberly Singleton, Pat Porter and Roy T. Evans, while acting as agents for all Defendants fraudulently represented to him that if he purchased the credit insurance offered him, his credit score/rating would be better and that he stood a better chance of getting approved for the loan he requested.

14. Defendants advised Plaintiff that if he refinanced his previous loans into a single loan, that would be the best way for him to save money. Defendants refused to allow Plaintiff to have a separate loan.

15. Defendants advised Plaintiff that purchasing the credit insurance offered was a good deal and offered great value and protection.

16. Defendants had a duty to Plaintiff to give him good advice and they failed to do so, to Plaintiff's detriment.

17. Based on each of the representations made by Defendants, Plaintiff agreed to purchase the credit insurance offered and refinance his loan.

18. Defendants' conduct under the circumstances was intentional and amounts to actual malice.

19. Plaintiff discovered the fraud within two (2) years of filing this lawsuit.

20. Defendants entered into a pattern or practice of fraudulent conduct that included the fraud practiced on Plaintiff.

21. At all times material hereto, Plaintiff depended on Defendants to advise him as to all loan requirements and insurance matters. Defendants had superior knowledge and bargaining power over Plaintiff.

22. The conduct by Defendants was intentional, gross, wanton, malicious, and/or oppressive.

### **COUNT ONE**

23. Plaintiff alleges all prior paragraphs of the Complaint as if set out here in full.

24. Defendants made the aforementioned fraudulent representations that they knew were false, or should have known were false, and intended for Plaintiff to rely on said false representations.

25. Plaintiff did rely on the representations made by Defendants and due to Defendants' fraudulent misrepresentation of material facts, Plaintiff was induced to act as previously described.

26. As a proximate consequence of Defendants' actions, Plaintiff was injured and damaged in at least the following ways: he paid money for insurance he did not want, he lost interest on said money, he paid excessive interest on his loans and accounts he otherwise would not have had to pay, he lost interest on the money attributed to the unnecessary payments, he has suffered mental anguish and emotional distress; and has otherwise been injured and damaged.

WHEREFORE, Plaintiff demands judgment against Defendants in such an amount of compensatory and punitive damages as a jury deems reasonable and may award, plus costs.

### **COUNT TWO**

27. Plaintiff alleges all prior paragraphs of the Complaint as if set out here in full.

28. Defendants negligently and/or wantonly hired, trained, and supervised Defendants Kimberly Singleton, Pat Porter and Roy T. Evans and their agents, alter-egos and/or representatives responsible for advising Plaintiff of the loan and insurance benefits and all other requirements.

29. As a proximate consequence of Defendants' actions, Plaintiff was injured and damaged as alleged herein.

WHEREFORE, Plaintiff demands judgment against Defendants in such an amount of compensatory and punitive damages as a jury deems reasonable and may award, plus costs.

### **COUNT THREE**

30. Plaintiff alleges all prior paragraphs of the Complaint as if set out here in full.

31. Plaintiff was not experienced in insurance and finance matters and placed a special trust and confidence in Defendants and consequently relied upon Defendants to properly advise him with respect to such matters.

32. Defendants undertook a duty to advise Plaintiff, held themselves out as experts, and as persons interested in Plaintiff's well-being, and generally exhibited behavior inconsistent with the typical debtor-creditor relationship.

33. As a result of the aforementioned actions, Defendants conduct amounts to a breach of their individual, contractual, professional and fiduciary obligations and duties to Plaintiff. Said conduct further amounts to a breach of the duties that arise as a matter of Alabama law.

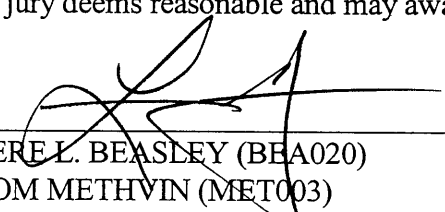
34. As a proximate consequence of the Defendants breach, Plaintiff was injured and damaged as alleged herein.

WHEREFORE, Plaintiff demands judgment against Defendants in such an amount of compensatory and punitive damages as a jury deems reasonable and may award, plus costs.

**COUNT FOUR**

35. Plaintiff alleges all prior paragraphs of the Complaint as if set out here in full.
36. Defendants negligently and/or wantonly made the aforementioned representations to Plaintiff.
37. Said action was a breach of the duty owed Plaintiff.
38. As a proximate consequence of said actions, Plaintiff was injured and damaged as described herein.

WHEREFORE, Plaintiff demands judgment against Defendant in such an amount of compensatory and punitive damages as a jury deems reasonable and may award, plus costs.

  
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JERE L. BEASLEY (BEA020)  
TOM METHVIN (MET003)  
C. LANCE GOULD (GOU007)  
Attorneys for Plaintiff

**OF COUNSEL:**  
**BEASLEY, ALLEN, CROW,**  
**METHVIN, PORTIS & MILES, P.C.**  
272 Commerce Street  
P. O. Box 4160  
Montgomery, Alabama 36103  
Telephone No.: (334) 269-2343  
Facsimile No.: (334) 954-7555

**PLAINTIFF REQUESTS TRIAL BY STRUCK JURY  
OF ALL ISSUES PRESENTED BY THIS CAUSE**

  
\_\_\_\_\_  
**OF COUNSEL**

IN THE CIRCUIT COURT OF BULLOCK COUNTY, ALABAMA

JOE T. SMITH,

Plaintiff,

v.

AMERICAN INTERNATIONAL GROUP, INC;  
et al.,

Defendants.

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\* Civil Action No. CV-05-104

SUMMONS

This service by personal service of this summons is initiated upon the written request of Plaintiff's attorney pursuant to the Alabama Rules of Civil Procedure.

NOTICE TO:           **AMERICAN INTERNATIONAL GROUP, INC.**  
                              **70 Pine Street**  
                              **New York, NY 10270**

The Complaint which is attached to this summons is important and you must take immediate action to protect your rights. You are required to mail or hand deliver a copy of a written Answer, either admitting or denying each allegation in the Complaint to,

**C. Lance Gould**  
**BEASLEY, ALLEN, CROW, METHVIN,**  
**PORTIS & MILES, P.C.**  
**Post Office Box 4160**  
**Montgomery, AL 36103-4160**

the attorney for the Plaintiff. THIS ANSWER MUST BE MAILED OR DELIVERED WITHIN THIRTY (30) DAYS FROM THE DATE OF DELIVERY OF THIS SUMMONS AND COMPLAINT AS EVIDENCED BY THE RETURN RECEIPT, OR A JUDGMENT BY DEFAULT MAY BE ENTERED AGAINST YOU FOR THE MONEY OR OTHER THINGS DEMANDED IN THE COMPLAINT. You must also file the original of your Answer with the Clerk of this Court within a reasonable time afterward.

  
CIRCUIT CLERK

Dated: 10/3/05

IN THE CIRCUIT COURT OF BULLOCK COUNTY, ALABAMA

JOE T. SMITH,

Plaintiff,

v.

AMERICAN INTERNATIONAL GROUP, INC;  
et al.,

Defendants.

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Civil Action No. CV-05-104

SUMMONS

This service by personal service of this summons is initiated upon the written request of Plaintiff's attorney pursuant to the Alabama Rules of Civil Procedure.

NOTICE TO:           **AMERICAN GENERAL CORPORATION**  
                              **2929 Allen Parkway**  
                              **Houston, TX 77019**

The Complaint which is attached to this summons is important and you must take immediate action to protect your rights. You are required to mail or hand deliver a copy of a written Answer, either admitting or denying each allegation in the Complaint to,

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**BEASLEY, ALLEN, CROW, METHVIN,**  
**PORTIS & MILES, P.C.**  
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**Montgomery, AL 36103-4160**

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CIRCUIT CLERK

Dated: 10/3/05



IN THE CIRCUIT COURT OF BULLOCK COUNTY, ALABAMA

JOE T. SMITH,

Plaintiff,

vs.

AMERICAN INTERNATIONAL GROUP,  
INC., et al.,

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CIVILCASE NO. CV-05-104

SUMMONS

This service by personal service of this summons is initiated upon the written request of Plaintiff's attorney pursuant to the Alabama Rules of Civil Procedure.

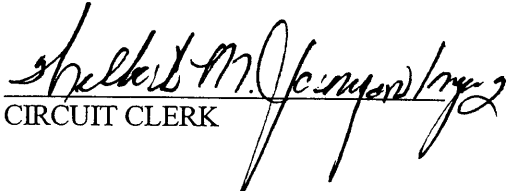
**NOTICE TO: AMERICAN GENERAL FINANCE, INC.**

**n/k/a American General Financial Services of Alabama, Inc.  
c/o CSC Lawyers Incorporating Service, Inc.  
150 S. Perry Street  
Montgomery, AL 36104**

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**C. Lance Gould  
BEASLEY, ALLEN, CROW, METHVIN,  
PORTIS & MILES, P.C.  
Post Office Box 4160  
Montgomery, AL 36103-4160**

the attorney for the Plaintiff. THIS ANSWER MUST BE MAILED OR DELIVERED WITHIN THIRTY (30) DAYS FROM THE DATE OF DELIVERY OF THIS SUMMONS AND COMPLAINT AS EVIDENCED BY THE RETURN RECEIPT, OR A JUDGMENT BY DEFAULT MAY BE ENTERED AGAINST YOU FOR THE MONEY OR OTHER THINGS DEMANDED IN THE COMPLAINT. You must also file the original of your Answer with the Clerk of this Court within a reasonable time afterward.

  
CIRCUIT CLERK

Dated: 10/3/05

IN THE CIRCUIT COURT OF BULLOCK COUNTY, ALABAMA

JOE T. SMITH,

Plaintiff,

v.

AMERICAN INTERNATIONAL GROUP, INC;  
et al.,

Defendants.

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\* Civil Action No. CV-05-104  
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SUMMONS

This service by personal service of this summons is initiated upon the written request of Plaintiff's attorney pursuant to the Alabama Rules of Civil Procedure.

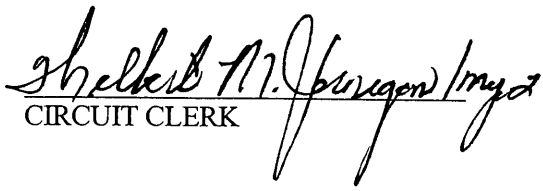
NOTICE TO:           **AMERICAN GENERAL FINANCE CORPORATION**  
                              **c/o Corporation Service Company**  
                              **251 East Ohio Street**  
                              **Suite 500**  
                              **Indianapolis, IN 46204**

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**C. Lance Gould**  
**BEASLEY, ALLEN, CROW, METHVIN,**  
**PORTIS & MILES, P.C.**  
**Post Office Box 4160**  
**Montgomery, AL 36103-4160**

the attorney for the Plaintiff. THIS ANSWER MUST BE MAILED OR DELIVERED WITHIN THIRTY (30) DAYS FROM THE DATE OF DELIVERY OF THIS SUMMONS AND COMPLAINT AS EVIDENCED BY THE RETURN RECEIPT, OR A JUDGMENT BY DEFAULT MAY BE ENTERED AGAINST YOU FOR THE MONEY OR OTHER THINGS DEMANDED IN THE COMPLAINT. You must also file the original of your Answer with the Clerk of this Court within a reasonable time afterward.

Dated: 10/3/05

  
CIRCUIT CLERK

IN THE CIRCUIT COURT OF BULLOCK COUNTY, ALABAMA

JOE T. SMITH,

Plaintiff,

vs.

AMERICAN INTERNATIONAL GROUP,  
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CIVILCASE NO. CV-05-104

SUMMONS

This service by personal service of this summons is initiated upon the written request of Plaintiff's attorney pursuant to the Alabama Rules of Civil Procedure.

NOTICE TO:           **MERIT LIFE INSURANCE COMPANY**  
                              **c/o CSC Lawyers, Inc.**  
                              **150 S. Perry Street**  
                              **Montgomery, AL 36104**

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**Montgomery, AL 36103-4160**

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CIVILCASE NO. CV-05-104

SUMMONS

This service by personal service of this summons is initiated upon the written request of Plaintiff's attorney pursuant to the Alabama Rules of Civil Procedure.

NOTICE TO: KIMBERLY SINGLETON  
c/o American General Finance, Inc.  
2723 Eastern Bypass  
Montgomery, AL 36117

The Complaint which is attached to this summons is important and you must take immediate action to protect your rights. You are required to mail or hand deliver a copy of a written Answer, either admitting or denying each allegation in the Complaint to,

C. Lance Gould  
BEASLEY, ALLEN, CROW, METHVIN,  
PORTIS & MILES, P.C.  
Post Office Box 4160  
Montgomery, AL 36103-4160

the attorney for the Plaintiff. THIS ANSWER MUST BE MAILED OR DELIVERED WITHIN THIRTY (30) DAYS FROM THE DATE OF DELIVERY OF THIS SUMMONS AND COMPLAINT AS EVIDENCED BY THE RETURN RECEIPT, OR A JUDGMENT BY DEFAULT MAY BE ENTERED AGAINST YOU FOR THE MONEY OR OTHER THINGS DEMANDED IN THE COMPLAINT. You must also file the original of your Answer with the Clerk of this Court within a reasonable time afterward.

Dated: 10/3/05

  
CIRCUIT CLERK

IN THE CIRCUIT COURT OF BULLOCK COUNTY, ALABAMA

JOE T. SMITH,

Plaintiff,

vs.

AMERICAN INTERNATIONAL GROUP,  
INC., et al.,

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CIVILCASE NO. CV-05-104

SUMMONS

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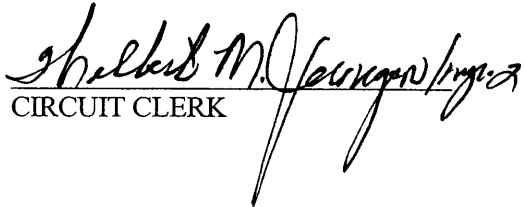
**NOTICE TO: PAT PORTER**

c/o American General Finance, Inc.  
2723 Eastern Bypass  
Montgomery, AL 36117

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**BEASLEY, ALLEN, CROW, METHVIN,**  
**PORTIS & MILES, P.C.**  
Post Office Box 4160  
Montgomery, AL 36103-4160

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CIRCUIT CLERK

Dated: 10/3/05

IN THE CIRCUIT COURT OF BULLOCK COUNTY, ALABAMA

JOE T. SMITH,

Plaintiff,

vs.

AMERICAN INTERNATIONAL GROUP,  
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CIVILCASE NO. CV-05-104

SUMMONS

This service by personal service of this summons is initiated upon the written request of Plaintiff's attorney pursuant to the Alabama Rules of Civil Procedure.

**NOTICE TO: ROY T. EVANS**

c/o American General Finance, Inc.  
2723 Eastern Bypass  
Montgomery, AL 36117

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**C. Lance Gould**  
**BEASLEY, ALLEN, CROW, METHVIN,**  
**PORTIS & MILES, P.C.**  
Post Office Box 4160  
Montgomery, AL 36103-4160

the attorney for the Plaintiff. THIS ANSWER MUST BE MAILED OR DELIVERED WITHIN THIRTY (30) DAYS FROM THE DATE OF DELIVERY OF THIS SUMMONS AND COMPLAINT AS EVIDENCED BY THE RETURN RECEIPT, OR A JUDGMENT BY DEFAULT MAY BE ENTERED AGAINST YOU FOR THE MONEY OR OTHER THINGS DEMANDED IN THE COMPLAINT. You must also file the original of your Answer with the Clerk of this Court within a reasonable time afterward.

  
CIRCUIT CLERK

Dated: 10/3/05

7160 3901 9848 8110 6055

**TO:** American General Corporation  
2929 Allen Parkway  
Houston, TX 77019

**SENDER:** C. Lance Gould

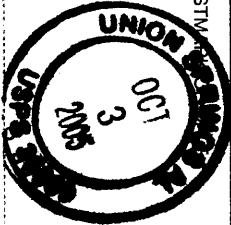
**REFERENCE:** Joe T. Smith v. American  
International G  
CV-05-164

PS Form 3800, June 2000

RETURN RECEIPT SERVICE	Postage	
	Certified Fee	
	Return Receipt Fee	
	Restricted Delivery	
	Total Postage & Fees	4.88

US Postal Service  
**Receipt for  
Certified Mail**

No Insurance Coverage Provided  
Do Not Use for International Mail



7160 3901 9848 8110 6048

**TO:** American International Group, Inc.  
70 Pine Street  
New York, NY 10270

**SENDER:** C. Lance Gould

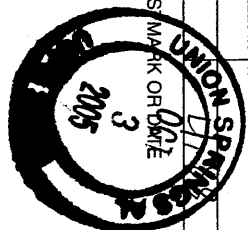
**REFERENCE:** Joe T. Smith v. American  
International G  
CV-05-104

PS Form 3800, June 2000

RETURN RECEIPT SERVICE	Postage	
	Certified Fee	
	Return Receipt Fee	
	Restricted Delivery	
	Total Postage & Fees	4.88

US Postal Service  
**Receipt for  
Certified Mail**

No Insurance Coverage Provided  
Do Not Use for International Mail



7160 3901 9848 8110 6062

**TO:** American General Finance, Inc.  
n/k/a American General Financial Services of  
Alabama, Inc.  
c/o CSC Lawyers Incorporating Service, Inc.  
150 S. Perry Street  
Montgomery, AL 36104

**SENDER:** C. Lance Gould

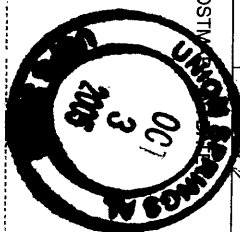
**REFERENCE:** Joe T. Smith v. American  
International G  
CV-05-104

PS Form 3800, June 2000

RETURN RECEIPT SERVICE	Postage	
	Certified Fee	
	Return Receipt Fee	
	Restricted Delivery	
	Total Postage & Fees	4.88

US Postal Service  
**Receipt for  
Certified Mail**

No Insurance Coverage Provided  
Do Not Use for International Mail



7160 3901 9848 8110 5553

**TO:** Pat Porter  
c/o American General Finance, Inc.  
2723 Eastern Bypass  
Montgomery, AL 36117

**SENDER:** C. Lance Gould

**REFERENCE:** Joe T. Smith v. American  
International G  
CV-05-104

Form 3800, June 2000

TURN CEIPT RVICE	Postage	
	Certified Fee	
	Return Receipt Fee	
	Restricted Delivery	
	Total Postage & Fees	4.88

US Postal Service  
**Receipt for  
Certified Mail**  
Insurance Coverage Provided  
Not Use for International Mail



7160 3901 9848 8110 5539

**TO:** Merit Life Insurance Company  
c/o CSC Lawyers, Inc.  
150 S. Perry Street  
Montgomery, AL 36104

**SENDER:** C. Lance Gould

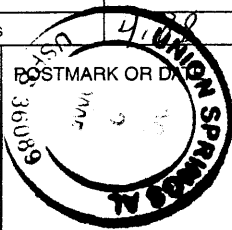
**REFERENCE:** Joe T. Smith v. American  
International G  
CV-05-164

PS Form 3800, June 2000

RETURN RECEIPT SERVICE	Postage	
	Certified Fee	
	Return Receipt Fee	
	Restricted Delivery	
	Total Postage & Fees	4.88

US Postal Service  
**Receipt for  
Certified Mail**

No Insurance Coverage Provided  
Do Not Use for International Mail



7160 3901 9848 8110 5560

**TO:** Roy T. Evans  
c/o American General Finance, Inc.  
2723 Eastern Bypass  
Montgomery, AL 36117

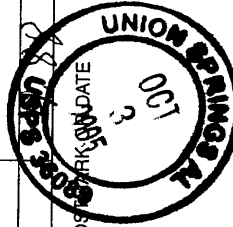
**SENDER:** C. Lance Gould

**REFERENCE:** Joe T. Smith v. American  
International G

CV-05-104

PS Form 3800, June 2000

RETURN RECEIPT SERVICE	Postage
	Certified Fee
	Return Receipt Fee
	Restricted Delivery
Total Postage & Fees	



US Postal Service

**Receipt for  
Certified Mail**

No Insurance Coverage Provided  
Do Not Use for International Mail

7160 3901 9848 8110 6024

**TO:** American General Finance Corporation  
c/o Corporation Service Company  
251 East Ohio Street  
Suite 500  
Indianapolis, IN 46204

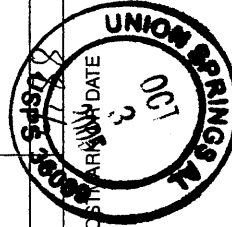
**SENDER:** C. Lance Gould

**REFERENCE:** Joe T. Smith v. American  
International G

CV-05-104

PS Form 3800, June 2000

RETURN RECEIPT SERVICE	Postage
	Certified Fee
	Return Receipt Fee
	Restricted Delivery
Total Postage & Fees	



US Postal Service

**Receipt for  
Certified Mail**

No Insurance Coverage Provided  
Do Not Use for International Mail

7160 3901 9848 8110 5546

**TO:** Kimberly Singleton  
c/o American General Finance, Inc.  
2723 Eastern Bypass  
Montgomery, AL 36117

**SENDER:** C. Lance Gould

**REFERENCE:** Joe T. Smith v. American  
International G

CV-05-104

PS Form 3800, June 2000

RETURN RECEIPT SERVICE	Postage
	Certified Fee
	Return Receipt Fee
	Restricted Delivery
Total Postage & Fees	



US Postal Service

**Receipt for  
Certified Mail**

No Insurance Coverage Provided  
Do Not Use for International Mail



AVS0351

CV 2005 000104.00

JUDGE: HON. BURT SMITHART

ALABAMA JUDICIAL DATA C  
CASE ACTION SUMMARY  
CIRCUIT CIVIL

TER

IN THE CIRCUIT COURT OF BULLOCK COUNTY

JOE T SMITH VS AMERICAN INTL GROUP INC ET AL  
FILED: 09/28/2005 TYPE: BAD FAITH/FRAUD/MISR TY

TRIAL: JURY

TRACK:

DATE1: CA: CA DAT  
DATE2: AMT: \$.00 PAYMENT  
DATE3:

PLAINTIFF 001: SMITH JOE T

ATTOR Y: GOULD CHARLES LANCE  
GOU00 P. O. BOX 4160AL 00000-0000  
PHONE: (334)000-0000  
ENTERED: 10/03/2005 ISSUED:  
SERVED: ANSWERED:MONTGOMERY, AL 36103  
TYPE: (334)269-2343  
JUDG. ENT: *Jane Benson 026 Tom McArthur 003*DEFENDANT 001: AMERICAN INTL GROUP INC  
70 PINE STREET

ATTORNEY:

NEW YORK, NY 10270-0000  
PHONE: (334)000-0000  
ENTERED: 10/03/2005 ISSUED: 10/03/2005 TYPE: CERTIFIED  
SERVED: ANSWERED: JUDGEMENT:DEFENDANT 002: AMERICAN GENERAL CORPORATION  
2929 ALLEN PARKWAY

ATTORNEY:

HOUSTON, TX 77019-0000  
PHONE: (334)000-0000  
ENTERED: 10/03/2005 ISSUED: 10/03/2005 TYPE: CERTIFIED  
SERVED: *10/4/05* ANSWERED: JUDGEMENT:DEFENDANT 003: AMERICAN GENERAL FINANCE INC  
C/O CSC LAWYERS INC SERVI ATTORNEY:150 S PERRY STREET  
MONTGOMERY, AL 36104-0000  
PHONE: (334)000-0000  
ENTERED: 10/03/2005 ISSUED: 10/03/2005 TYPE: CERTIFIED  
SERVED: *10/4/05* ANSWERED: JUDGEMENT:DEFENDANT 004: AMERICAN GENERAL FINANCE CORP  
C/O CORP SERVICE CO ATTORNEY:251 E OHIO ST STE 500  
INDIANAPOLIS, IN 46204-0000  
PHONE: (334)000-0000  
ENTERED: 10/03/2005 ISSUED: 10/03/2005 TYPE: CERTIFIED  
SERVED: *10/7/05* ANSWERED: JUDGEMENT:DEFENDANT 005: MERIT LIFE INSURANCE CO  
C/O CSC LAWYERS INC ATTORNEY:150 S PERRY STREET  
MONTGOMERY, AL 36104-0000  
PHONE: (334)000-0000  
ENTERED: 10/03/2005 ISSUED: 10/03/2005 TYPE: CERTIFIED  
SERVED: ANSWERED: JUDGEMENT:DEFENDANT 006: SINGLETON KIMBERLY  
C/O AMERICAN GENERAL FINA ATTORNEY:2723 EASTERN BYPASS  
MONTGOMERY, AL 36117-0000  
PHONE: (334)000-0000  
ENTERED: 10/03/2005 ISSUED: 10/03/2005 TYPE: CERTIFIED  
SERVED: ANSWERED: JUDGEMENT:

IJJ 10/03/2005

CV 2005 000104.00

AVS0351

CV 2005 000104.00

JUDGE: HON. BURT SMITHART

ALABAMA JUDICIAL DATA CENTER  
CASE ACTION SUMMARY  
CIRCUIT CIVIL

IN THE CIRCUIT COURT OF BULLOCK COUNTY

JOE T SMITH VS AMERICAN INTL GROUP INC ET AL  
FILED: 09/28/2005 TYPE: BAD FAITH/FRAUD/MISR TYPE TRIAL: JURY TRACK:

\*\*\*\*\*  
 DATE1: CA: CA DATE:  
 DATE2: AMT: \$.00 PAYMENT:  
 DATE3:  
 \*\*\*\*\*

DEFENDANT 007: PORTER PAT  
 C/O AMERICAN GENERAL FINA ATTORNEY:  
 2723 EASTERN BYPASS  
 MONTGOMERY, AL 36117-0000  
 PHONE: (334)000-0000  
 ENTERED: 10/03/2005 ISSUED: 10/03/2005 TYPE: CERTIFIED  
 SERVED: ANSWERED: JUDGEMENT:

DEFENDANT 008: EVANS ROY T  
 C/O AMERICAN GENERAL FINA ATTORNEY:  
 2723 EASTERN BYPASS  
 MONTGOMERY, AL 36117-0000  
 PHONE: (334)000-0000  
 ENTERED: 10/03/2005 ISSUED: 10/03/2005 TYPE: CERTIFIED  
 SERVED: 10/4/05 ANSWERED: JUDGEMENT:

9/28/05 Complaint filed.  
 10/3/05 Returned by C.M.  
 10/4/05 C.M. served on Def #3.  
 10/4/05 " " " Def #8  
 10/7/05 " " " Defs #2, 4

VIJ 10/03/2005

CV 2005 000104.00

AVS0352

CASE: CV 2005 000104.00  
JUDGE: HON. BURT SMITHART

ALABAMA JUDICIAL DATA CENTER  
CASE ACTION SUMMARY CONTINUATION  
CIRCUIT CIVIL

IN THE CIRCUIT COURT OF BULLOCK COUNTY

JOE T SMITH VS AMERICAN INTL GROUP INC ET AL  
FILED: 09/28/2005 TYPE: BAD FAITH/FRAUD/MISR TYPE TRIAL: JURY TRACK:

\*\*\*\*\*  
DATE1: CA: CA DATE:  
DATE2: AMT: \$.00 PAYMENT:  
\*\*\*\*\*

NIJ 10/03/2005

BULLOCK COUNTY ALABAMA JUDICIAL DATA CENTER  
DATE OF RECEIPT: 10/03/2005 TIME: 10:17:35 RECEIPT NUMBER: 015783  
RECEIPT FOR CASE: CV 2005-000102-00 BATCH: 2006001  
RECEIVED FROM: GOULD CHARLES LANCE  
JOE T SMITH VS AMERICAN INTL GROUP INC ET AL  
ACCOUNTS RECEIPTED:  
CVCS  
JDMD  
RECEIVED BY: WIJ  
CHECK AMOUNT  
\$326.00  
\$100.00  
\$426.00

HANA SODICIAE  
 FEE SHEET  
 CIRCUIT CIVIL

CASE:CV 2005 000104-00

JOE T SMITH VS AMERICAN INTL GROUP INC ET AL  
PATTY:GOULD CHARLES LANCE DATTY:  
P. O. BOX 4160

MONTGOMERY, AL 36103

[illegible][illegible]

State of Alabama Unified Judicial System  Form AR Civ-93 Rev. 5/99	<b>COVER SHEET</b> <b>CIRCUIT COURT – CIVIL CASE</b> (Not For Domestic Relations Cases)	Case Number <div style="border: 1px solid black; padding: 2px;">           C V <u>2005</u> <u>104</u> -          </div> Date of Filing: <div style="border: 1px solid black; padding: 2px;">           09 28 2005         </div> Month Day Year
GENERAL INFORMATION		
IN THE CIRCUIT COURT OF <u>BULLOCK</u> , ALABAMA <div style="display: flex; justify-content: space-between;"> <div>           Plaintiff  <u>JOE T. SMITH</u> </div> <div>           Defendant  <u>AMERICAN INTERNATIONAL GROUP, INC.</u> </div> </div>		
<div style="display: flex; justify-content: space-between;"> <div style="width: 45%;"> <b>First Plaintiff</b>  <input type="checkbox"/> Business  <input type="checkbox"/> Government  <input checked="" type="checkbox"/> Individual  <input type="checkbox"/> Other         </div> <div style="width: 45%;"> <b>First Defendant</b>  <input checked="" type="checkbox"/> Business  <input type="checkbox"/> Government  <input type="checkbox"/> Individual  <input type="checkbox"/> Other         </div> </div>		
<b>NATURE OF SUIT:</b> Select primary cause of action, by checking box (check only one) the best characterizes your action:		
<b>TORTS: PERSONAL INJURY</b> <input type="checkbox"/> WDEA - Wrongful Death <input type="checkbox"/> TONG - Negligence: General <input type="checkbox"/> TOMV - Negligence: Motor Vehicle <input type="checkbox"/> TOWA - Wantonness <input type="checkbox"/> TOPL - Product Liability/AEMLD <input type="checkbox"/> TOMM - Malpractice-Medical <input type="checkbox"/> TOLM - Malpractice-Legal <input type="checkbox"/> TOOM - Malpractice-Other <input checked="" type="checkbox"/> TBFM - Fraud/Bad Faith/Misrepresentation <input type="checkbox"/> TOXX - Other: _____  <b>TORTS: PERSONAL INJURY</b> <input type="checkbox"/> TOPE - Personal Property <input type="checkbox"/> TORE - Real Property  <b>OTHER CIVIL FILINGS</b> <input type="checkbox"/> ABAN - Abandoned Automobile <input type="checkbox"/> ACCT - Account & Nonmortgage <input type="checkbox"/> APAA - Administrative Agency Appeal <input type="checkbox"/> ADPA - Administrative Procedure Act <input type="checkbox"/> ANPS - Adults in Need of Protective Services	<b>OTHER CIVIL FILINGS (cont'd)</b> <input type="checkbox"/> MSXX - Birth/Death Certificate Modification/Bond Forfeiture Appeal/Enforcement of Agency Subpoena/Petition to Preserve <input type="checkbox"/> CVRT - Civil Rights <input type="checkbox"/> COND - Condemnation/Eminent Domain/Right-of-Way <input type="checkbox"/> CTMP - Contempt of Court <input type="checkbox"/> CONT - Contract/Ejectment/Writ of Seizure <input type="checkbox"/> TOCN - Conversion <input type="checkbox"/> EQND - Equity Non-Damages Actions/Declaratory Judgment/Injunction Election Contest/Quiet Title/Sale For Division <input type="checkbox"/> CVUD - Eviction Appeal/Unlawful Detainer <input type="checkbox"/> FORJ - Foreign Judgment <input type="checkbox"/> FORF - Fruits of Crime Forfeiture <input type="checkbox"/> MSHC - Habeas Corpus/Extraordinary Writ/Mandamus/Prohibition <input type="checkbox"/> PFAB - Protection From Abuse <input type="checkbox"/> FELA - Railroad/Seaman (FELA) <input type="checkbox"/> RPRO - Real Property <input type="checkbox"/> WTEG - Will/Trust/Estate/Guardianship/Conservatorship <input type="checkbox"/> COMP - Workers' Compensation <input type="checkbox"/> CVXX - Miscellaneous Circuit Civil Case	
<b>ORIGIN (check one):</b> F <input checked="" type="checkbox"/> INITIAL FILING      A <input type="checkbox"/> APPEAL FROM DISTRICT COURT      O <input type="checkbox"/> OTHER: R <input type="checkbox"/> REMANDED      T <input type="checkbox"/> TRANSFERRED FROM OTHER CIRCUIT COURT		
<b>HAS JURY TRIAL BEEN DEMANDED?</b> <input checked="" type="checkbox"/> YES <input type="checkbox"/> NO      Note: Checking "Yes" does not constitute a demand for a jury trial. (See Rules 38 and 39, Ala.R.Civ.P., for procedure)		
<b>RELIEF REQUESTED:</b> <input checked="" type="checkbox"/> MONETARY AWARD REQUESTED <input type="checkbox"/> NO MONETARY AWARD REQUESTED		
<b>ATTORNEY CODE:</b> <div style="border: 1px solid black; padding: 2px; display: inline-block;">G O U 0 0 7</div> <u>September 27, 2005</u> <u>Lance Gould</u> Date      Signature of Attorney/Party filing this form		
<b>MEDIATION REQUESTED:</b> <input type="checkbox"/> YES <input checked="" type="checkbox"/> NO <input type="checkbox"/> UNDECIDED		





7160 3901 9848 8110 6024

3. Service Type **CERTIFIED MAIL**4. Restricted Delivery? (Extra Fee) ☐ Yes

1. Article Addressed to:

American General Finance Corporation  
c/o Corporation Service Company  
251 East Ohio Street  
Suite 500  
Indianapolis, IN 46204

CV-05-104

PS Form 3811, July 2001

Domestic Return Receipt

2. Article Number



7160 3901 9848 8110 6055

3. Service Type **CERTIFIED MAIL**4. Restricted Delivery? (Extra Fee) ☐ Yes

1. Article Addressed to:

American General Corporation  
2929 Allen Parkway  
Houston, TX 77019

CV-05-104

PS Form 3811, July 2001

Domestic Return Receipt

2. Article Number



7160 3901 9848 8110 5560

3. Service Type **CERTIFIED MAIL**4. Restricted Delivery? (Extra Fee) ☐ Yes

1. Article Addressed to:

Roy T. Evans  
c/o American General Finance, Inc.  
2723 Eastern Bypass  
Montgomery, AL 36117

CV-05-104

PS Form 3811, July 2001

Domestic Return Receipt

COMPLETE THIS SECTION ON DELIVERY

A. Received by (Please Print Clearly)

B. Date of Delivery

Tina Stanter 10-7-05

C. Signature

X Tina M Stanter ☐ Agent ☐ AddresseeD. Is delivery address different from item 1?  
If YES, enter delivery address below:☐ Yes ☐ No

Reference Information

Joe T. Smith v. American International  
G

C. Lance Gould

COMPLETE THIS SECTION ON DELIVERY

A. Received by (Please Print Clearly)

B. Date of Delivery

APW 10-7

C. Signature

X APW ☐ Agent ☐ AddresseeD. Is delivery address different from item 1?  
If YES, enter delivery address below:☐ Yes ☐ No

Reference Information

Joe T. Smith v. American International  
G

C. Lance Gould

COMPLETE THIS SECTION ON DELIVERY

A. Received by (Please Print Clearly)

B. Date of Delivery

Melodee Wyatt 10/4/05

C. Signature

X Melodee Wyatt ☐ Agent ☐ AddresseeD. Is delivery address different from item 1?  
If YES, enter delivery address below:☐ Yes ☐ No

Reference Information

Joe T. Smith v. American International  
G

C. Lance Gould

☒ Agent  
☐ Addressee  
☐ Yes  
☐ No
D. Is delivery address different from item 1?  
If YES, enter delivery address below:

Reference Information

Joe T. Smith v. American International  
G  
C. Lance Gould

7160 3901 9848 8110 6062

3. Service Type **CERTIFIED MAIL**4. Restricted Delivery? (Extra Fee) ☐ Yes

1. Article Addressed to:

American General Finance, Inc.  
n/k/a American General Financial Services of  
Alabama, Inc.  
c/o CSC Lawyers Incorporating Service, Inc.  
150 S. Perry Street  
Montgomery, AL 36104

CV-05-104

PS Form 3811, July 2001

Domestic Return Receipt

UNITED STATES POSTAL SERVICE

First-Class Mail  
Postage & Fees Paid  
USF  
Permit No. G-10

● PRINT YOUR NAME, ADDRESS AND ZIP CODE BELOW ●

~~Tammy Price~~  
~~Beasley, Allen~~  
~~272 Commerce Street~~  
~~Montgomery, AL 36104~~

WILBERT M. JERNIGAN  
Bullock County Circuit Clerk  
P.O. Box 230  
Union Springs, Ala. 36089  
PHONE (334) 738-2280

002



UNITED STATES POSTAL SERVICE

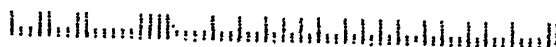
First-Class Mail  
Postage & Fees Paid  
USF  
Permit No. G-10

● PRINT YOUR NAME, ADDRESS AND ZIP CODE BELOW ●

~~Tammy Price~~  
~~Beasley, Allen~~  
~~272 Commerce Street~~  
~~Montgomery, AL 36104~~

WILBERT M. JERNIGAN  
Bullock County Circuit Clerk  
P.O. Box 230  
Union Springs, Ala. 36089  
PHONE (334) 738-2280

C043



UNITED STATES POSTAL SERVICE

First-Class Mail  
Postage & Fees Paid  
USF  
Permit No. G-10

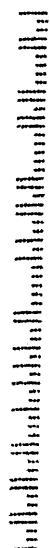
● PRINT YOUR NAME, ADDRESS AND ZIP CODE BELOW ●

~~Tammy Price~~  
~~Beasley, Allen~~  
~~272 Commerce Street~~  
~~Montgomery, AL 36104~~

WILBERT M. JERNIGAN  
Bullock County Circuit Clerk  
P.O. Box 230  
Union Springs, Ala. 36089  
PHONE (334) 738-2280

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Union Springs, Ala. 36089  
PHONE (334) 738-2280

~~Tammy Price~~  
~~Beasley, Allen~~  
~~272 Commerce Street~~  
~~Montgomery, AL 36104~~



002

no Receipt